

- Page 3 -

in Liber H53 at folio 25, your Respondents averring that instead said deed is from Nicholas H. Pitts, Executor, to Christian Harding bargaining, selling, assigning and setting over the reversion in Lots 83 and 84 of said Plat and the right to receive the ground rents arising from said Lots, and is recorded in Liber H. S. No. 2 at folio 25.

D. That the deed referred to in subparagraph E of said Paragraph 5 of said Bill of Complaint is dated the 4th day of December, 1968 and not December 8, 1968, and is to Benjamin D. Palmer and James Frenkil and not to Benjamin Palmer and James Frenkil and further that said deed is not a deed of exchange as is implied in said subparagraph E and your Respondents are not aware of the amount of land "inadvertently acquired" so neither admit nor deny said two and one-half acre tract and further neither admit nor deny that any land was "inadvertently acquired" since they have no knowledge of the intentions of the said Benjamin D. Palmer and James Frenkil.

E. That the deed referred to in subparagraph F of said Paragraph 5 of said Bill of Complaint is from Benjamin D. Palmer and James Frenkil and not from Benjamin Palmer and James Frenkil.

F. That your Respondents neither admit nor deny the allegations contained in subparagraph G of said Paragraph 5 of said Bill of Complaint because they have no knowledge regarding who prepared the plat, nor its date, nor whether or not it is revised, nor can they see a sanitary sewer line constructed by the Town in Federal Street on said plat, but that they deny that the Town ever constructed a sanitary sewer line there or anywhere else in said Town, but that your Respondents admit that the Plat does appear to show the relation of said lots to Federal Street and North Alley and the former schoolhouse built in that area.

SIXTH: That your Respondents neither admit nor deny the allegations contained in Paragraph 6 of said Bill of Complaint since they were not furnished a copy of said Paragraph and cannot find it among the records of Your Honorable Court, and have no knowledge therefore of what is contained therein, but